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November 30, 1998

**Dr. Larry G. Hart
National Toxicology Program
Board of Scientific Counselors
Report on Carcinogens (RoC) Subcommittee
P.O. Box 12233
Research Triangle Park, NC 27709**

Dear Dr. Hart:

The Municipal Waste Management Association is concerned that the National Toxicology Program's Board of Scientific Counselors is considering changing the status of 2,3,7,8-tetrachlorodibenzo-para-dioxin (TCDD) to "known human carcinogen", while there is still considerable controversy surrounding the human health impacts of this compound.

The decision to reclassify TCDD from a "probable" to a "known" human carcinogen must be made based on epidemiological evidence that the compound is linked to human cancers. Without scientific evidence of this link, TCDD should remain classified as a "probable human carcinogen". It is our understanding that there is not sufficient available data to make this link and justify changing the status of TCDD. Many unanswered questions remain.

The Municipal Waste Management Association is an affiliate of the United States Conference of Mayors. The MWMA is composed of the solid waste and environmental directors from local governments across the nation. The Conference of Mayors is the national organization of cities (population 30,000 or more); each represented by its chief elected official, the Mayor.

The Conference of Mayors and the MWMA work closely with the U.S. Environmental Protection Agency on many issues, including the Maximum Achievable Control Technology (MACT) standards for Municipal Waste Combustors (MWC's). The emission levels from this source has been reduced dramatically since 1990 and will continue to be reduced (until it represents less than one percent of the known sources of dioxin) as all MWC units come into compliance with the MACT standards in 2000.

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Local governments have been at the forefront of efforts to reduce emissions of dioxin and other pollutants. However, many issues (including education, public safety, economic development and transportation) face local governments and compete for available local government resources.

One priority of the Conference of Mayors and the MWMA is the redevelopment of "brownfields". Brownfields are abandoned and/or underutilized industrial properties in the nations cities. The reclassification of compounds like TCDD to "known human carcinogen", with out appropriate scientific evidence, may impact the clean up and redevelopment of brownfields in our cities. Without a determined effort to redevelop brownfields and other inner city properties, economic development opportunities will continue to be more available in "greenfield" areas, thus contributing to urban sprawl and the adverse impacts associated with this type of development.

The decision to change the characterization of TCDD should only be made if the epidemiological evidence clearly links the compound to human cancers. It is our understanding that data is not available to show this link and therefore any change from "potential human carcinogen" is not warranted.

Thank you for considering our views on this matter.

Sincerely,



Michael A. Gagliardo
Senior Staff Associate